

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE PEOPLE OF THE STATE OF NEW  
YORK, by LETITIA JAMES, Attorney  
General of the State of New York,

Plaintiff,

—against—

CITIBANK, N.A.,

Defendant.

24 Civ. 0659 (JPO)

**REPLY DECLARATION OF CHARLES MICHAEL**

1. I am a partner with Steptoe LLP, counsel for Defendant Citibank, N.A. (“Citibank”). I submit this reply declaration in further support of Citibank’s motion to dismiss.

2. Attached are true copies of the following exhibits.

Ex.	Document
A	Excerpts from Ernest T. Patrikis, Thomas C. Baxter, Jr. and Raj K. Bhala, <i>Wire Transfers, A Guide to U.S. and International Laws Governing Fund Transfers</i> (1993)
B	Excerpt from the website of the Consumer Financial Protection Bureau (“CFPB”), entitled “What is a wire transfer?,” <a href="https://www.consumerfinance.gov/ask-cfpb/what-is-a-wire-transfer-en-1163/">https://www.consumerfinance.gov/ask-cfpb/what-is-a-wire-transfer-en-1163/</a>
C	National Commission on Electronic Transfers, <i>EFT and the Public Interest</i> (Feb. 23, 1977) (interim report) (excerpts)
D	CFPB, <i>Remittance Rule Assessment Report</i> (Rev. April 2019), <a href="https://files.consumerfinance.gov/f/documents/bcftp_remittance-rule-assessment_report_corrected_2019-03.pdf">https://files.consumerfinance.gov/f/documents/bcftp_remittance-rule-assessment_report_corrected_2019-03.pdf</a> (excerpts)
E	CFPB, <i>Supervision and Examination Manual</i> , Electronic Fund Transfer Act (EFTA) (March. 2019), <a href="https://files.consumerfinance.gov/f/documents/cfpb_supervision-and-examination-manual_efta-exam-procedures-incl-remittances_2019-03.pdf">https://files.consumerfinance.gov/f/documents/cfpb_supervision-and-examination-manual_efta-exam-procedures-incl-remittances_2019-03.pdf</a> (excerpts)
F	CFPB, Seth Frotman, <i>Banks’ responsibility for scams</i> (May 29, 2024), <a href="https://www.consumerfinance.gov/about-us/blog/banks-responsibility-for-scams/">https://www.consumerfinance.gov/about-us/blog/banks-responsibility-for-scams/</a>
G	Letter from The Clearing House Association, the Bank Policy Institute, the New York Bankers Association, and the American Bankers Association to Seth Frotman, Office of the General Counsel, CFPB (June 22, 2024), <a href="https://bpi.com/wp-content/uploads/2024/06/Letter-to-CFPB-Re-NYAG-Litigation_6.22.pdf">https://bpi.com/wp-content/uploads/2024/06/Letter-to-CFPB-Re-NYAG-Litigation_6.22.pdf</a>

Ex.	Document
H	Telecommunications Instructions Authorization/Indemnification, Oct. 1, 1999, <i>Braga Filho v. Interaudi Bank</i> , No. 03 Civ. 4795 (S.D.N.Y.), ECF 33-2, filed April 4, 2008

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
June 25, 2024

/s/ Charles Michael  
Charles Michael